## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

| In Re:             | )                          |
|--------------------|----------------------------|
|                    | ) Case No.: 24-00287-DSC13 |
| ASHLEY ISEHI PRIM, | )                          |
| SSS: ###-##-3379   | )                          |
|                    | )                          |
|                    | )                          |
| Debtor.            | )                          |
|                    | )                          |

## TRUSTEE'S OBJECTION TO CONFIRMATION AND MOTION TO DISMISS

COMES NOW Bradford W. Caraway, Chapter 13 Standing Trustee, and objects to the confirmation of Debtor's plan and moves to dismiss this case based upon the following grounds:

- 1. The Debtor is not paying as proposed in the plan.
- 2. The plan does not provide for payment of potential lawsuit proceeds regarding a hit and run cause of action.

WHEREFORE, the Trustee objects to the confirmation of the Debtor's plan and moves to dismiss this case. The Trustee prays for such other relief as the Court deems appropriate.

Bradford W. Caraway Chapter 13 Standing Trustee

By: /s/Mary Frances Fallaw
Mary Frances Fallaw
Staff Attorney
Post Office Box 10848
Birmingham, Alabama 35202
(205) 323-4631

## **CERTIFICATE OF SERVICE**

I hereby certify that a correct copy of the forgoing Objection has been forwarded by email or U.S. Mail to the following on this the 19th day of March 2024:

BOND, BOTES, REESE & SHINN, P.C. ECFBIRMINGHAM@BONDNBOTES.COM

ASHLEY ISEHI PRIM 6600 AVENUE K BESSEMER, AL 35020

> /s/Mary Frances Fallaw Staff Attorney

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